"Furjanic, Sean"
<sefurjanic@state.pa.us>
10/31/2006 07:20 AM

To Brian Trulear/R3/USEPA/US@EPA
cc "Ferry, Martin" <mferry@state.pa.us>
bcc
Subject FW: Comments--Proposed NPDES Permit

FYI, comments submitted by Glatfelter on their draft permit.

-----Original Message-----
From: Brandt, Corey A. [mailto:cbrandt@glatfelter.com]
Sent: Monday, October 30, 2006 3:23 PM
To: sefurjanic@state.pa.us
Cc: Hamon, Jeff R.
Subject: Comments--Proposed NPDES Permit

Sean-

Here is an electronic copy of Glatfelter's comments on the proposed NPDES permit. They were sent ceritfied mail (via USPS) today.

<<NPDES Permit Comments final.doc>>

Regards,

~Corey

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Environmental Director - Spring Grove Facility
Glatfelter
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NPDES Permit Comments final.doc

October 30, 2006

CERTIFIED MAIL – Return Receipt Requested

Mr. Sean M. Furjanic
Permitting & Technical Services Section
Watershed Management Program
PA DEP Southcentral Region
909 Elmerton Avenue
Harrisburg, PA 17110-8200

Re: Draft NPDES Permit No. 0008869
P. H. Glatfelter Company Comments

Dear Mr. Furjanic:

This letter presents the comments of the P. H. Glatfelter Company ("Glatfelter") regarding draft NPDES Permit Number 0008869, which was transmitted to Glatfelter via the Department's letter of September 20, 2006. As instructed, we have posted the public notice that was enclosed with the September 20, 2006 letter near the entrance of Glatfelter's property and near Glatfelter's Outfall 001. The notices will remain in place for no less than 30 days.

1. Temperature Limitations

a. *Interim Average Weekly Instream Temperature Limitations; Footnote 7, Pages 8-9.* According to the Water Quality Protection Report, the interim temperature limitations from Glatfelter's current NPDES permit were to be carried forward into the new permit. Glatfelter concurs that these limitations are appropriate, but believes that the interim temperature limitations should be based on temperature measurement at the Bair Bridge monitoring point. The proposed permit instead utilizes a new downstream monitoring point 1,230 feet below Outfall 001. Using different monitoring point located an appreciable distance from the current monitoring point is inappropriate, because it indirectly changes the effluent limitation without demonstrable justification. Glatfelter does not oppose monitoring temperature at the new downstream monitoring point 1,230 feet below Outfall 001 as long as that data is not used to determine compliance with the interim limitations.

b. *Final Maximum Daily Average Downstream Temperature Limitations; Footnote 7, Page 9.* Glatfelter firmly believes that an evaporative spray cooling system is the only viable cooling alternative available for our conditions (treated effluent containing residual BOD and TSS). Glatfelter is not certain that such a system will allow it to meet the proposed final maximum daily temperature limits at all times. Because we are

currently gathering information from vendors on this system, Glatfelter reserves further comment on the proposed maximum daily temperature limits until the necessary information has been obtained. It is likely that Glatfelter will request that the Department provide for exceptions to those limits to account for times when meteorological conditions limit evaporative cooling. Glatfelter believes that such an exception may be necessary when the average daily wind speed is less than 5 mph, and when wet bulb temperatures are less than 10 degrees F lower than desired effluent temperatures. Within one month, Glatfelter will provide further comment regarding these limits.

c. *Final Average Monthly Downstream Temperature Limitations; Footnote 7, Page 9.* Glatfelter reserves further comment on the proposed final average monthly downstream temperature limits until we have the necessary information from potential vendors to fully evaluate this subject. It is likely that Glatfelter will seek exemptions from these limits for months where meteorological conditions are significantly different than historic norms. Within one month, Glatfelter will provide further comments regarding these limits.

d. *Average Monthly Action Level Temperatures; Footnote 8, Page 9.* The monthly action levels, which are well below the water quality criteria in 25 Pa Code Chapter 93, should be deleted from the permit. Although not labeled as limitations in the permit, the requirement to develop and implement corrective action measures has the effect of a limitation by forcing action when temperatures exceed the action levels. As indicated in the Water Quality Protection Report, there is no justification for setting temperature limits at a level less then the Chapter 93 criteria.

e. *Hourly Instream Temperature Change; Part A.I.a. on Page 2 and Footnote 9 on Page 10.* Glatfelter will not be able to achieve compliance with this limitation when effluent flow from the treatment plant ceases or begins. With the current plant configuration, effluent flow to the stream will cease and begin again when there are shutdowns and startups of the Mill and when effluent from the Primary Wastewater Treatment Plant is diverted to the spill basins. Primary effluent is diverted to the spill basins if there is a spill of liquor or a substance that would be toxic to the "bugs" (such as acid or caustic) in order to protect the Secondary Wastewater Treatment Plant and prevent NPDES permit violations. After the installation of effluent cooling facilities, effluent flow to the stream will also cease and begin when the effluent pump malfunctions or the cooling basin needs to be taken off line.

Glatfelter requests a variance from the hourly instream temperature change water quality criteria as follows: The maximum hourly instream temperature change limitation would not apply in cases when effluent flow is diverted to the spill basins in order to protect the biology of the Secondary Treatment Plant and/or to prevent a NPDES permit violation. In order to minimize the instream temperature changes associated with planned Mill startups and shutdowns, Glatfelter proposes to develop and implement BMPs within 90 days of permit issuance. Glatfelter shall design the cooling basin so as to minimize large fluctuations in effluent temperature.

2. New Sampling Locations

a. *24-hour Composite Sampling for Upstream and Downstream Color; Part A.I.a. on Page 2 and Footnote 5 on Page 10.* Glatfelter requests that instream color monitoring be done using grab samples. Glatfelter believes the Department's proposal for 24-hour composite samples for instream color monitoring to be extraordinary and unwarranted. If the Department's goal is to increase sampling frequency, Glatfelter would be willing to obtain two or three grab samples daily, provided they are collected during daylight hours (which is important from a safety standpoint). The proposed requirement for 24-hour composite sampling would require the installation of equipment and power supplies at a remote location on public land (the US Army Corps of Engineers Indian Rock Dam floodplain leased by the Pennsylvania Game Commission for public hunting). Glatfelter does not believe installation of continuous samplers at such a location is a viable option.

b. *Requirement to implement continuous sampling for color at new locations within 90 days of permit issuance; Footnote 5, Page 8.* New continuous samplers cannot be installed within 90 days of permit issuance, nor could installation of facilities to allow grab sampling, as requested above. Installation of samplers or facilities to allow grab sampling will require that new access roads be built and that electricity be run out to the sampling sites. Before any work can start, Glatfelter will need to secure permits under 25 Pa Code Chapter 105 because the sampling sites are adjacent to waters of the Commonwealth and in a floodway. Glatfelter will also need to obtain permission and access to the land from the Army Corps of Engineers, which owns the land on which the samplers will stand. Glatfelter believes it will take 6 months from the time all necessary permits and permissions are received to complete the work necessary to install facilities for grab sampling or continuous samplers.

c. *New downstream sampling location not more than 1,230 feet downstream of Outfall 001; Part A.1.b., Page 3, and Footnote 5, Page 8.* Glatfelter requests that the monitoring point for downstream color be moved to a point no more than 1800 - 2000 feet downstream from Outfall 001 (adjacent to the northeast corner of No. 18 Lagoon). Glatfelter requests this location so that the existing roadway along the top of the No. 18 Lagoon berm can be used to access the site. As there are no tributaries entering the Codorus Creek between the points that the Department and Glatfelter are proposing, there will be no dilution and therefore no measurable difference in the color measured at the two sites.

d. *Sampling for color within centerline of stream; Footnote 5, Page 8.* The requirement to sample for color within the centerline of the stream is unnecessary and should be dropped from the permit. The stream color will be no different at the centerline than in an area of robust flow with no eddy currents or backflow. Glatfelter would be willing to demonstrate the parity of Glatfelter proposed sampling with centerline sampling.

e. *Upstream Sampling Location Next to the Primary Treatment Plant; Part A.I.b. on Page 3 and Footnotes 5 and 6 on Page 8.* Glatfelter requests that the upstream sampling location for both color and temperature be located immediately upstream from Outfall 001. Glatfelter believes that this would provide the most accurate representation of the

effect of Outfall 001 on these parameters. Additionally, utilizing a location immediately upstream from Outfall 001 would largely eliminate any errors or differences caused by time of travel (particularly with regard to instream temperature).

3. *AOX Limitations for Outfall 001; Part A.I.a., Page 2.*

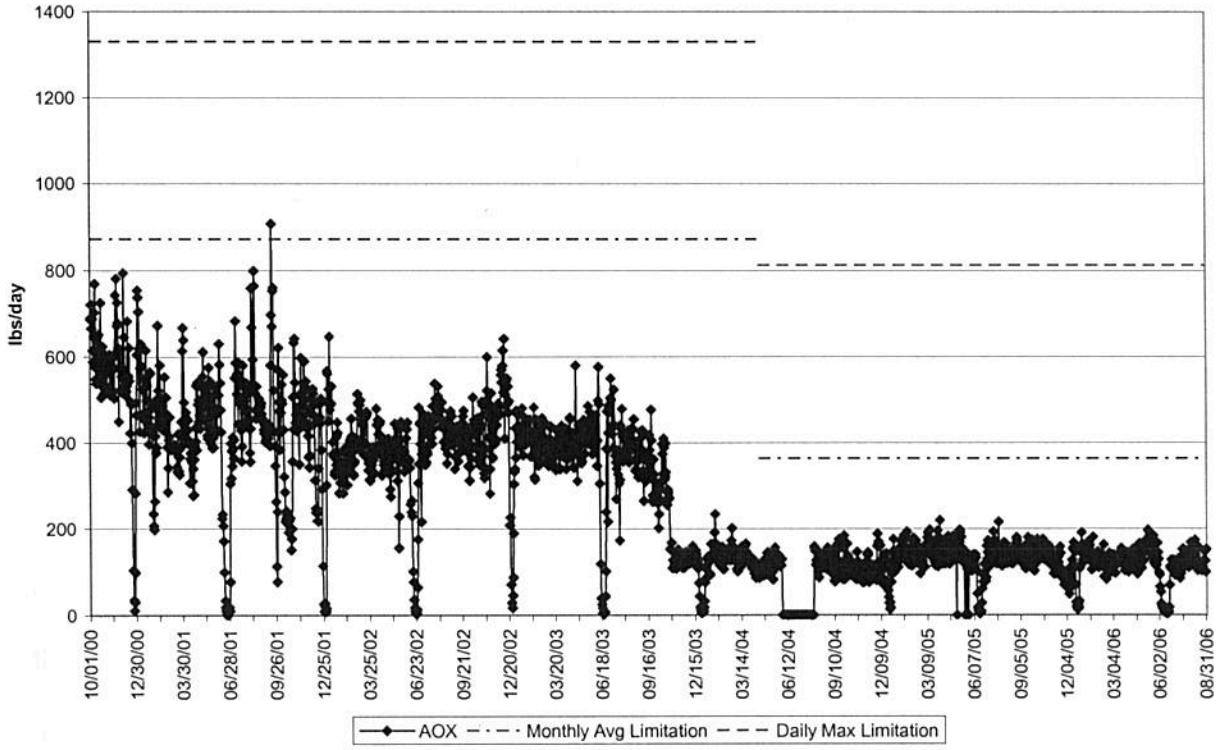
   a. The table of discharge limitations on Page 2 indicates that there is a total annual AOX discharge limitation of 336 lbs/year. This is incorrect. As indicated in Footnote 3 on page 8, the limitation is an annual average, which should be reflected in the table of discharge limitations on Page 2. Also, as noted in the Water Quality Protection Report, the existing monthly average limitation of 364 lbs/day was to be used as an annual average. (The report erroneously listed the limitation as 336 lbs/day).

   b. The once monthly minimum monitoring requirement for AOX should be reduced to a frequency of once quarterly in November 2008. 40 CFR 430.02(e) states that the once monthly minimum monitoring frequency is applicable to Advanced ECF dischargers in the VATIP for a duration of four years starting one year after achievement of the applicable BAT limitations set forth in 40 CFR 430.24(b)(4)(i). Glatfelter has been in compliance with the applicable BAT limitations since November of 2003 and certified that it meets the advanced ECF criteria. Pursuant to 40 CFR 430.02, the appropriate monitoring frequency for effluent AOX after 5 years of compliance with the BAT limitations should be determined by DEP in accordance with 40 CFR 122.44(i).

   Glatfelter is currently monitoring AOX on a daily basis. The data collected since the effective date of Glatfelter's current permit is shown in Table 1. Based on the consistency of AOX discharge levels since the implementation of ECF bleaching in late 2003 and the large compliance margin, Glatfelter believes that once quarterly monitoring for AOX would be wholly adequate to demonstrate compliance with the AOX discharge limitations.

Table 1

Table 1: AOX in Secondary Effluent



4. *Color: Corrective Action Plan required for Net Instream Color Increase >75 PCU; Footnote 5, Page 8.* In the Water Quality Protection Report, the Department discusses the development of the effluent limitations for color from Glatfelter's Outfall 001. While Glatfelter does not agree with all of the Report's statements or conclusions regarding this issue, Glatfelter concurs that the effluent limitations for color contained in the last NPDES permit should be applied in this renewal and agrees that the corrective action concept set forth in the draft permit is appropriate, so long as it relies on a net instream color action level of 75 pcu or greater. With regard to the details of the concept, Glatfelter requests that, in the event of two exceedances of 75 pcu for net instream color within a twelve month period, Glatfelter first have the opportunity to investigate and explain the exceedances to the Department and that the Department retain the discretion to require a corrective action plan after such explanation. Glatfelter further requests that it be provided thirty days after the second exceedance within a twelve month period to complete the investigation and submit the explanation to the Department.

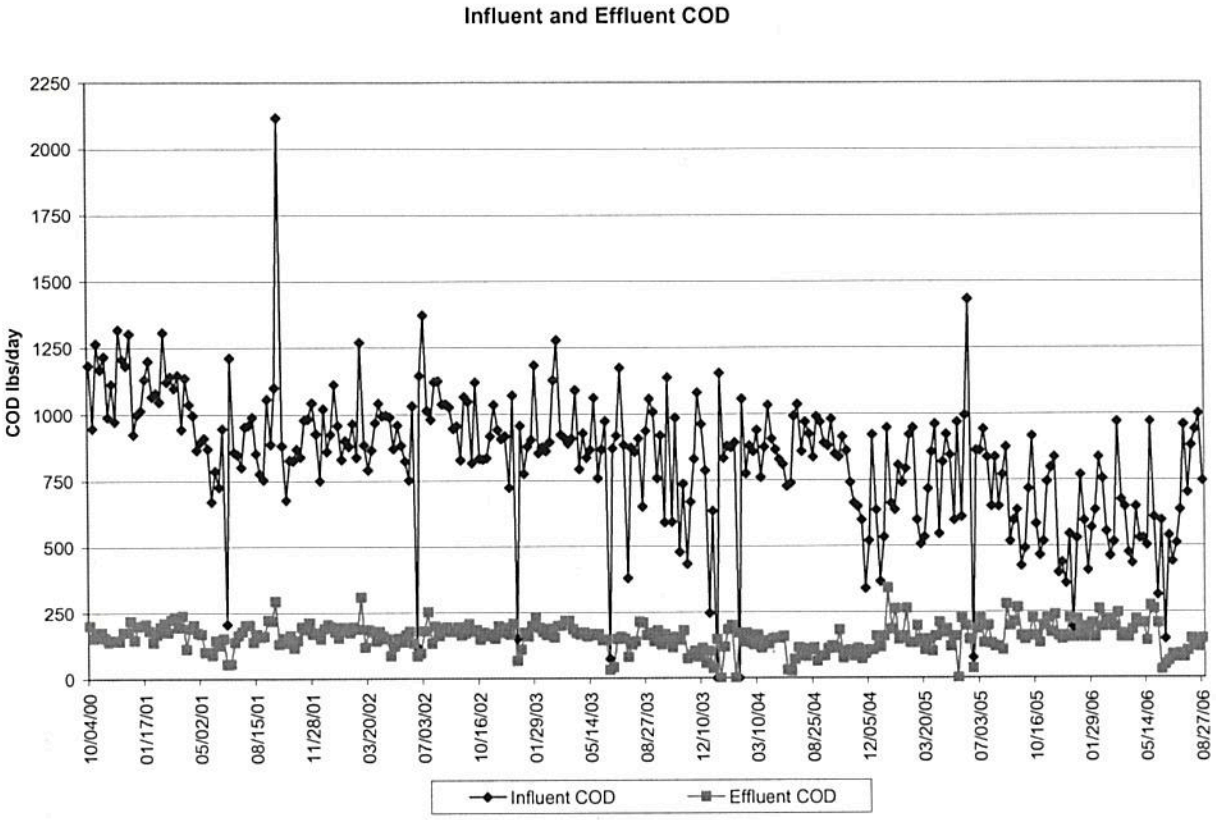
5. *Total Suspended Solids Limitations for Outfall 001; Part A.I.a., Page 2.* Glatfelter requests that the existing Total Suspended Solids limits be retained through this permit cycle. Glatfelter foresees significant potential challenges with respect to TSS performance with on-going changes in mill operation and the impact of the proposed effluent cooling system. The latter may have the potential to generate biological pin floc. The current TSS limits are not lax; the current average monthly and maximum daily limits are 24.7 and 48.8 percent, respectively, of New Source Performance Standards (NSPS) for the bleached kraft subcategory (40 CFR 430.25). Retaining the current TSS limits through this next permit

cycle would provide Glatfelter the necessary compliance margin to proceed with the implementation of effluent cooling without additional non-compliance concerns.

6. *Fecal Coliform Monitoring; Part A.I.a., Page 3.* Glatfelter requests that the fecal coliform monitoring requirement be revised to an *E. Coli* monitoring requirement. As noted in the Water Quality Protection Report, paper mill effluents are known to contain *Klebsiella*, which is a coliform bacteria, but not one of fecal origin. Because *Klebsiella* responds to the fecal coliform assay, its presence creates a false positive result. The *E. Coli* assay, which excludes *Klebsiella*, is a better indicator of fecal contamination and more appropriate for monitoring compliance with the Chapter 93 Bac_1 water quality criteria for fecal coliform in a paper mill effluent.

7. *COD Monitoring in Influent and Outfall 001; Part A.I.a., Page 3.* The COD monitoring requirements should be reduced in frequency from once per week to once per month. The Water Quality Protection Report indicates that "COD monitoring (or other organic-based monitoring alternatives) of the influent is required by the federal regulations at 40 CFR 430.03(h)(2)(i)." Glatfelter monitors the Pulpmill sewer color to comply with this federal monitoring requirement, and as such, influent COD monitoring is not necessary. Regarding the effluent COD monitoring, EPA chose not to set a BAT limitation for COD in 40 CFR 430 Subpart B when the Cluster Rule was promulgated, and Glatfelter is not aware that EPA has any current activity directed towards consideration of a COD limitation. The COD content of the wastewater influent and secondary effluent from Glatfelter's Spring Grove Mill has been thoroughly characterized via weekly monitoring over the past 6 years; this data is shown in Table 2 below. Monthly monitoring would be more than adequate to provide the data necessary for the Department and Glatfelter to recognize any trends in COD content.

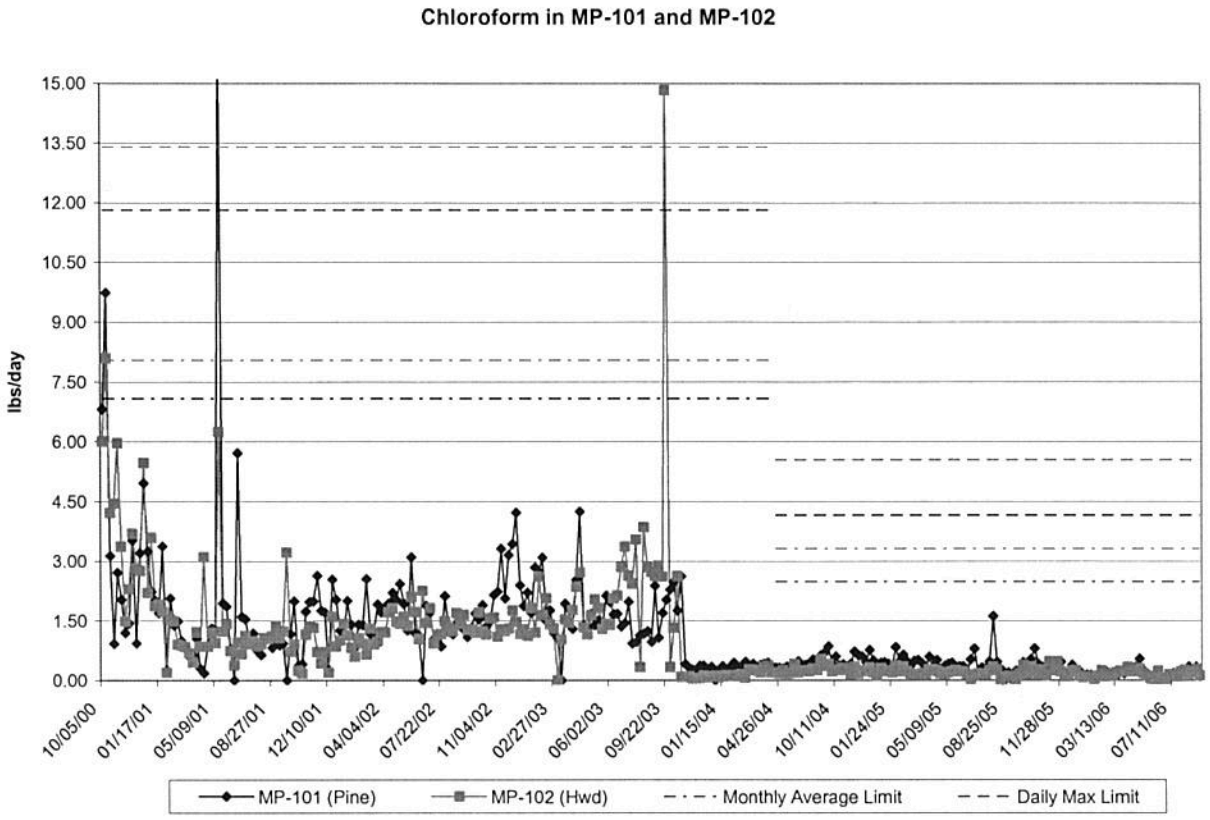
Table 2



8. *Chloroform Limitations for MP-101 and MP-102; Part A.III.a. on Page 5 and Part A.IV.a. on Page 6.* Glatfelter requests that the monitoring frequency for chloroform be reduced to once quarterly. This reduced monitoring frequency is in accordance with 40 CFR 430.02(c) footnote f, which states that bleach plant effluent chloroform monitoring by advanced ECF dischargers is to be suspended after one year of monitoring demonstrating compliance with the applicable BAT limitations, and that following that one year of monitoring, the permitting authority is to determine the appropriate monitoring frequency. Additionally, as set forth in 40 CFR 430.02(c), only monthly monitoring is required for advanced ECF dischargers (for one year) upon achieving the BAT limitations, whereas Glatfelter has been monitoring weekly.

   As required to implement reduced monitoring, Glatfelter has been in compliance with the applicable BAT limitations since November of 2003 and certified that it meets the advanced ECF criteria. Glatfelter is currently monitoring chloroform on a weekly basis. The data collected since the effective date of Glatfelter's current permit is shown in Table 3. Based on the consistency of chloroform levels since the implementation of ECF bleaching in late 2003 and the large compliance margin, Glatfelter believes that once quarterly monitoring for chloroform would be wholly adequate to demonstrate compliance with the chloroform discharge limitations of 40 CFR 430.24.

Table 3



9. *Requirements Applicable to Autocausticizing; Footnote 12, Page 10.* Glatfelter began using the autocausticizing process at a limited rate on August 7, 2006. Glatfelter received a Plan Approval from the Bureau of Air Quality on 5/26/2006 for use of the process at a rate not to exceed 4% autocausticizing. The previous autocausticizing trial was run at an average autocausticizing rate of 12.5%. The boron data collected for Glatfelter's effluent during the last trial showed that the concentration of boron in the Codorus Creek was significantly less than the water quality criteria for boron at all times. The boron data from the trial is shown below in Tables 4 and 5.

   The 6/16/03 spike in the boron concentration in our secondary effluent concentration was caused by the sewering of Pulpmill liquors for the annual Mill maintenance shutdown. Despite the increase in effluent concentration, the Creek concentration remained well below the water quality criteria, as the CMC criteria applies to the stream concentration, not the discharge. Based on the boron data from the previous trial and the fact that autocausticizing is currently operating at less than one third of the rate of the previous trial, Glatfelter requests that the Department impose a monthly boron monitoring requirement for the secondary effluent rather than weekly monitoring for both the effluent and the Codorus Creek. Glatfelter would also monitor for boron whenever there is an exceedence of the BMP action levels developed and implemented pursuant to 40 CFR 430.03 (indicating that liquor from the Pulpmill was sewered). We do not believe that instream monitoring for boron is

necessary given that Creek concentrations remained so far under the water quality criteria during the last trial.

Table 4

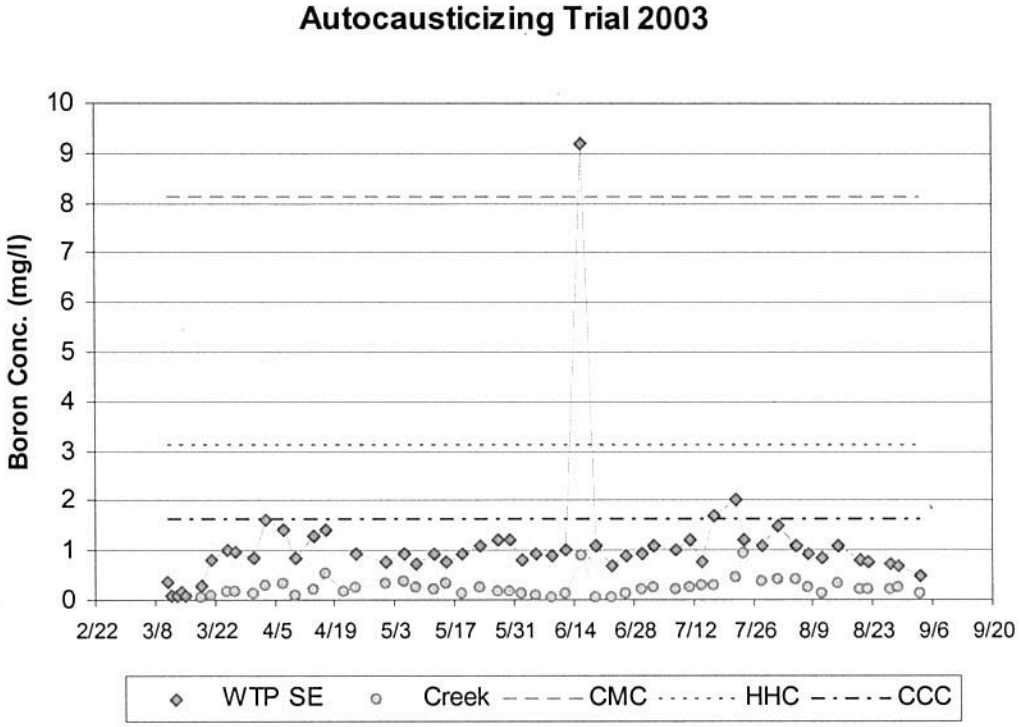
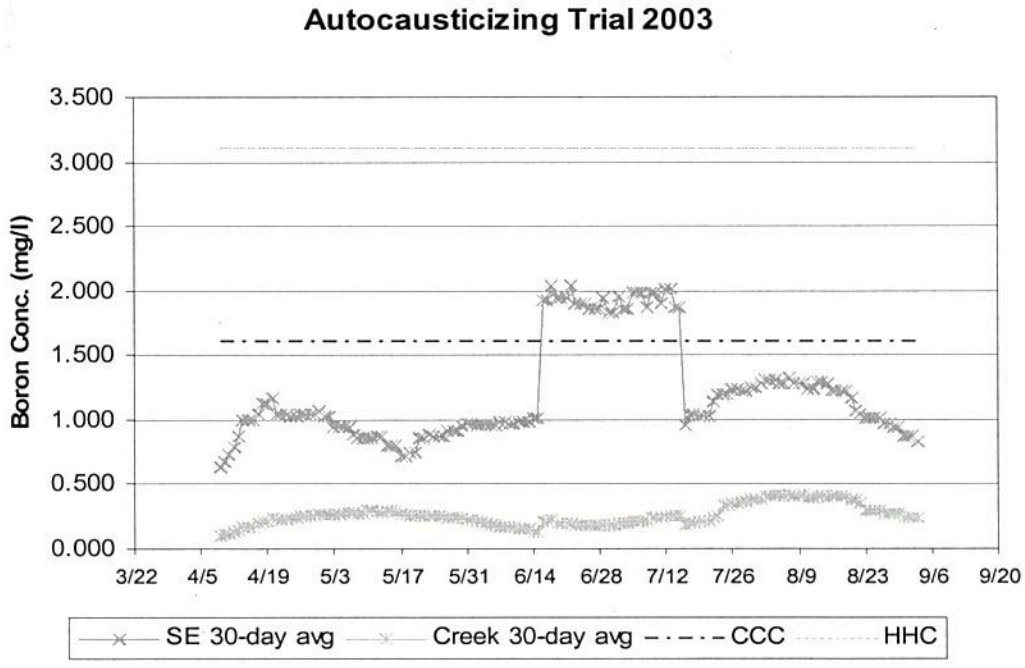


Table 5



10. *Stormwater Outfall Sampling; Part A.V., Page 7.* Glatfelter requests that only grab samples be required for storm water monitoring. Grab samples will typically contain higher concentrations of measured pollutants, and are therefore more conservative. An analysis of Glatfelter's storm water sampling results for the past four years (2002 – 2005) shows that grab samples had higher levels of measured pollutants than composite samples for 110 of 144 parameters (76.4%). (It should be noted that 12 of the 34 parameters for which composite samples contained higher concentrations of measured pollutants were associated with SW – 42, a sampling site where composite sampling most likely collects storm water of predominately off-site origin.) Glatfelter also notes the difficulties it has had the past two years collecting composite samples in a timely manner. Limited availability of composite storm water samplers and extended periods of dry weather have lead to queues and delays. This will only be exacerbated by the fact that Glatfelter will be sampling thirteen storm water outfalls in the next permit cycle versus the six currently being sampled.

11. *Sediment Study; Part C.I.E., Page 20.* Glatfelter believes that the proposed requirement for sediment sampling and analysis is unwarranted and should be removed from the permit. Measurable concentrations of "toxic parameters" are found in most wastewaters, as well as drinking and surface waters. Glatfelter strongly believes the invertebrate data from the 316(a) temperature study unequivocally demonstrate that the solids from Outfall 001 are not toxic. As documented in the 316(a) study report, there were significant increases in the number of invertebrates and the percentage of filter feeders from the upstream riffle sampling station to the immediately downstream riffle sampling station. This is absolutely not indicative of toxicity.

    Glatfelter specifically objects to following aspects of the sediment sampling proposed in the draft permit: (1) the requirement to collect samples within 50 feet of the discharge (which may limit what type of bottom substrate can be sampled); (2) the lack of sample collection protocol; and (3) the limited number of samples required will prevent any meaningful comparison of upstream and downstream samples. It is possible that an upstream sample is not required if downstream samples are only to be compared to NOAA screening levels.

12. *Biological Monitoring Study; Part Part C.I.F., Page 20 and Appendix A, Page A-1.* Glatfelter requests that the permit be modified so that it contains only a time table to allow Glatfelter to propose a study plan and to conduct the approved study within the duration of the permit; specific methodologies and evaluation criteria should be developed outside the context of a permit renewal. Glatfelter feels strongly that a collaborative effort with the Department to develop a plan to evaluate the efficacy of revised temperature limits would lead to an improved study. Glatfelter believes we demonstrated our ability to work collaboratively with the Department during the most recent 316(a) thermal variance study. Glatfelter is encouraged by the Department's proposed use of a modified EPA 1999 Rapid Bioassessment Protocol and would be willing to build on that framework. However, Glatfelter's initial opinion is that the proposed methodology may be too rigid, hence our request to work with the Department to customize the methodology for this specific application. Glatfelter believes that the Department and Glatfelter need to reach consensus on evaluation criteria in advance in order to avoid the potential for significant disagreements regarding the results of any study.

13. *WET Testing; Part C.I.G., Page 21.* Glatfelter believes the Department's request for acute WET testing for *Selenastrum capricornutum*, and therefore any acute WET testing, to be an error. WET testing of *S. capricornutum* is a chronic test with growth, not lethality, as an endpoint. Glatfelter also notes that a different dilution series is specified for *S. capricornutum*, than for the other two organisms. Glatfelter has no objection to the 50% dilution series for *S. capricornutum*, but did not understand the basis for the difference

14. *Organics testing; Part C.I.H., Page 21.* Glatfelter requests that the proposed "Total Toxic Organics" (TTO) testing requirement be eliminated. Glatfelter believes this additional testing to be unwarranted and unnecessary. The TTO group appears to be the summation of Pollutant Group 3 – 6 parameters (Modules 6 – 9 of the NPDES application package). Glatfelter submitted the testing results required (Pollutant Groups 1 -3) for its industrial category with its permit renewal application. It is assumed that the Department's selection of required pollutant group testing is based on the likelihood that those parameters will be detected in the permittee's effluent. As such, Glatfelter questions the need to do testing that the Department does not require on a broader scale for the Fine Bleached Kraft category. It should also be noted that Glatfelter would have to repeat Pollutant Group 3 testing, as the three rounds of testing done for the permit renewal application were performed over one year ago.

15. *Instream monitoring program, Part C.II on page 22.* Glatfelter requests that the number of sampling locations be reduced to one (Martins Bridge). Glatfelter also requests that the minimum time between samples be reduced to three hours to accommodate the completion of sampling during a normal 8-hour work day. Glatfelter understood this testing to be a check to ensure that the combined impact of Outfall 001 and any leachate that may be entering the Codorus Creek from the lagoon area would not jeopardize Water Quality Criteria. Only the downstream site is required to accomplish that goal. It is intuitive that the greatest potential impact would be at the downstream site. Glatfelter would advise that the results of the monitoring program as proposed should not be used to conduct a mass balance as time of travel has not been accounted for. Furthermore, any potential corrective action regarding the unnamed tributary and the spring would be through modification of Glatfelter's lagoon closure process, and therefore would be best addressed through the residual waste program.

16. *Chemical Additive Usage Rates.*

    a. *Chemical Additive Usage Rates; Part C.III.A., Page 22.* Prior to reading the Water Quality Protection Report prepared for this permit, Glatfelter was not aware that the Department had a policy on additives, as one is not available or mentioned on DEP's website. As such, we understood "chemical additives" to be only those materials described in the current and proposed permits. That is, "[c]hemical additives to control corrosion, scaling, algae, slime, fouling, oxygen, etc." None of the additives used by Glatfelter are for these purposes, and as such, Glatfelter did not believe that is used additives subject to regulation by the Department. The Water Quality Protection Report, however, goes on to say that "[chemical additives] also include substances/compounds added to the wastewater such as polymers, water softeners, flocculents, coagulants, emulsion breakers, dispersants and oxygen scavengers." Based on this description, Glatfelter realized that it does use a number of materials considered by the Department to be chemical additives.

In addition to the chemical additives listed in the proposed permit, Glatfelter requests that the Department approve the following two additives: sodium hypochlorite bleach for foul condensate odor control and ACT 1625C polymer, which would be used as a back-up if the PARAFLOC 710 became unavailable. The MSDSs for these materials and the other information required by the Department will be submitted within one week of this letter.

b. *Approved Maximum Usage Rates; Part C.III.B, Page 22.* Glatfelter requests that this permit condition specify that the approved maximum usage rates apply only to additives used in the Secondary Wastewater Treatment Plant (i.e. they would not apply to the Primary Treatment Plant or sludge dewatering). Additionally, Glatfelter requests that the approved maximum usage rates for Byo-Gon PX-109, Specialty Chemical "A" and Specialty Chemical "B" be increased by 25% over the levels specified in the proposed permit. Although, on average, usage rates of these additives will be significantly less than the maximum allowable, Glatfelter anticipates that there will be days when the higher usage rate could be required to remain in compliance with NPDES discharge limitations.

c. *Process for obtaining approval of a change or increase in additives; Part C.III.C-F, Page 23.*

   i. Glatfelter requests that a provision be added to the permit to allow a change in additives under emergency conditions without prior Department approval. Emergency conditions would be defined as situations where an approved additive unexpectedly becomes unavailable, or the exceedence of a maximum approved usage rate is required to maintain compliance with NPDES discharge limitations.

   Glatfelter uses the additives listed in the draft permit in order to maintain good treatment performance and compliance with its NPDES permit limitations. In the event that one of the additives became unavailable (such as the result of a supplier plant failure, fire or other incident preventing production), Glatfelter would need to find a replacement additive immediately or risk potentially significant non-compliance with its NPDES permit. Under these circumstances, Glatfelter would provide the Department with the required information regarding the replacement additive within one week of its use.

   Glatfelter has estimated the maximum amount of each additive that it expects could be required to maintain good plant operation and compliance with its NPDES permit. These amounts are higher than Glatfelter has ever used in a single day. It is possible, however, that a plant upset (Mill or Wastewater Treatment) could drive up the need for one of the additives in order to maintain compliance. In that situation, Glatfelter would use the required amount of additive to maintain compliance, and would notify DEP of the increased usage within one day.

   ii. *Part C.III.C.* The information required to be submitted for approval of an additive may not be available for some types of additives. In order to obtain approval of a new additive or an increase in the maximum usage of an additive, Glatfelter will

submit all of the required information that is available for each additive. In the list of required data, the most difficult information to obtain or determine will be the analytical test method that could be used to verify final discharge concentrations when the product is in use; in many cases, there will either be no analytical test method for an additive or the additive will be consumed (leaving nothing to measure in the discharge).

iii. *Part C.III.E.* The proposed permit indicates that a "Chemical Additive Reporting Form" was enclosed with the permit. Glatfelter did not receive this form.

17. *Residual Waste Requirements; Part C.IV.11, 14, and 16, Page 25.* These conditions are not appropriate for a NPDES permit issued pursuant to the federal Clean Water Act and/or the Pennsylvania Clean Streams Law.

18. *Pulpmill Storm Sewer Valve; Part C.IV.12., Page 25.* Glatfelter requests that DEP eliminate this condition, which requires Glatfelter to obtain authorization from the Department prior opening the Pulp Mill Storm Sewer Valve (PMSSV). As noted in the Water Quality Protection Report, Glatfelter discovered in the fall of 2002 that a number of process water flows had been routed to the Pulpmill Storm Sewer, and would be released through stormwater outfall SW-38 adjacent to the Tail Race when the PMSSV was opened. These process water flows were all treated water, comprised of steam condensates, pump seal water, and boiler feed water. Glatfelter immediately began a program to re-route all process flows to the process sewer. This project was completed in early 2004, at which time Glatfelter returned operation of the PMSSV back to its original design. The valve is opened during heavy rains to prevent localized flooding in the Mill. Because there are no longer any process flows routed to the storm sewer, Glatfelter sees no reason that DEP authorization be required before discharging stormwater via outfall SW-38, so long as no unaddressed spills of black liquor or similar substances have occurred in the vicinity of the PMSSV.

19. *No. 3 Supernatant Station Requirements; Part C.IV.13, Page 25.* Glatfelter requests that this condition be removed from the permit. All of the pipes associated with the former No. 3 Supernatant Station have been disabled and do not present the threat of a release to the waters of the Commonwealth. Also, one of the pipes in this area is a stormwater conveyance for water running off the area of the never-completed landfill, which must remain in place for drainage of that area.

20. *Pump Station requirements; Part C.IV.15, Page 25.* Glatfelter requests that the pump station requirement be modified to allow until July 31, 2008 to provide adequate overflow prevention equipment for the No. 2 Supernatant Station, and to remove the requirement for telemetric capabilities on alarm systems. All of Glatfelter's pump stations currently have high level alarms hardwired to alarm panels at primary and secondary waste treatment. We consider this arrangement more reliable than the telemetric capability proposed. All but one pump station (the No. 2 Supernatant Station) are equipped with back-up power. Glatfelter has capped the Nos. 11 and 12 Lagoons with low permeability clay, and will be working with the Bureau of Waste Management to get approval to discharge surface run-off from that site as storm water. If that effort is successful, Glatfelter will cease the use of the No. 2 Supernatant Station. We hope to receive approval for direct discharge from this lagoon area within two years. We wish to avoid having to invest in a back-up power supply that will

only be operational for possibly one year or less. Also, there are other methodologies that can successfully prevent overflow from that pump station, such as a fail-closed valve installed between the lagoons and the pump station, therefore, there is no reason to require back-up power specifically.

21. *Prohibition of Non-Storm Water Discharges; Part C.V.A.2, Page 25.* Glatfelter requests that the Department revise this provision to state explicitly that the identified discharges *are* authorized so long as the discharge complies with Part V.D.2.b. In addition, Glatfelter requests that the list of identified discharges include discharges of potable water associated with water line maintenance.

22. *Reporting at or Below Detection Levels; Part C.VI.D., Page 31.* Glatfelter requests that this portion of the permit be modified to clearly specify that the reporting threshold for all parameters be the ML, and all values below the ML be reported as "<ML", which includes values between the MDL and ML. Glatfelter does not believe it is appropriate to report any value that can not be quantified within accepted standards of precision and accuracy, and any value less than the ML does not meet those accepted standards.

Thank you for your consideration of our comments. Glatfelter would welcome the opportunity to meet with the Department to discuss any or all of the comments we have submitted. Should you wish to set up such a meeting, or if you have any questions, feel free to contact me at (717) 225-4711 extension 2616 or cbrandt@glatfelter.com.

Sincerely,

GLATFELTER

Corey A. Brandt
Environmental Director